

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Holy Rosary Catholic School

Agency Code: 31-7093

School(s) Reviewed: Holy Rosary Catholic School

Review Date(s): 3/8/17

Date of Exit Conference: 3/8/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Holy Rosary Catholic School for the courtesies extended during the on-site review. Thank you to the Food Service Manager, Principal, and Staff for being available when answering questions and providing additional information when necessary. Administrative and Food Service staff were very receptive to recommendations and guidance. In addition, thank you for taking

the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The January lunch claim was validated and consolidated correctly.
2. The correct letter templates regarding Free and Reduced Meal Applications, Verification, and Direct Certification were used.
3. Verification was done completely and well documented. One application was verified. It was completed before the November 15 deadline. The Verification Collection Report was submitted before the February 1 deadline.

Technical Assistance and Program Requirement Reminders

1. As a reminder, you are required to run direct certification minimum of three times a year: at or near the beginning of the school year, three months after the initial run (November) and six months after the initial run (February).
2. The effective eligibility start date for a DC eligible student is the date of the original output file.
3. Direct Certification was run almost a week after school started. This should have been run prior to the beginning of school to decrease administrative burden approving applications. It is suggested to work on this a week before school starts.

Findings and Corrective Action Needed

☐ **Finding #1:** One household is receiving free benefits that should have originally been denied eligibility. The 10 digit case number listed was for Childcare Assistance which does not qualify for free meals.

- **Corrective Action Needed:** Notify the household, whose benefits will be decreased from free to paid, giving them 10 calendar days from the date of notification (date on the letter) before the reduction takes effect. Be sure to change the student's eligibility in the system, 10 calendar days from the date the notification letter was sent out. A letter was sent out on 3/9/17. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Business Administrative Assistant at Holy Rosary Catholic School. We appreciate your time and efforts spent preparing for and participating in the onsite review. Thank you also to the individuals who prepare and serve lunch, both in the cafeteria and in the preschool. Students of all ages appreciated the food quality, from the hot chicken sandwiches and tender

steamed broccoli to the crisp cucumbers and crunchy carrots. Finally, thank you for your openness to feedback, both positive and constructive criticism.

Technical Assistance and Program Requirement Reminders

Standardized Recipes

Use of standardized recipes is an important part of the national nutrition programs. Any menu item that has more than one ingredient should have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time when the exact procedures, equipment, and ingredients are used. This will be a continuous work in progress as you modify older recipes and update with current ingredients in stock. Technical assistance was given on the creamy broccoli soup and loaded turkey sub recipes served during the review week. Continue to use the resources on the DPI website regarding recipe standardization. These include a checklist for pieces of information needed to standardize a recipe, tools to help analyze the meal component contribution, nutrient analysis tools, and templates to organize all information once obtained. These are found at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>.

Production Records

Transport sheets may not be substituted for production records, which must include required information. A comprehensive list of “Must Haves” and “Nice to Haves” is available at <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/production-record-must-have.pdf>.

Production records are imperative to document that food meeting the meal pattern was served in the appropriate serving sizes. While there is no required template, there are examples on our website: <http://dpi.wi.gov/school-nutrition/nationalschool-lunch-program/menu-planning/production-records>. Record planned usage, actual usage, and leftovers. This not only will help in planning, reduction of food waste, but will help you get an accurate nutrient analysis on your weekly menus. Use cup volume amounts when recording portion sizes on the production records for fruits and vegetables. This will be the easiest way to make sure the meal pattern is being met. Crediting information for meat/meat alternate and grain items should be recorded as ounce equivalents.

Vegetable Subgroups

Each vegetable subgroup has a specific minimum weekly requirement. These requirements are outlined on the Lunch Meal Pattern Table, located at the following address: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>. During the week of review, the beans/peas vegetable subgroup minimum weekly requirement was not met. Consider serving baked beans, refried beans, garbanzo beans, or black beans. Green beans, green peas, and lima beans do not credit toward the beans/peas subgroup.

Family Style Meal Service

Lunch is served to preschool students in their classrooms. Food is put on platters and in bowls at a centralized location, then delivered to classrooms. Teachers in each classroom plate foods for the children, but not in full portions. For example, packets of dried cranberries were split between two plates, chicken sandwiches were cut into quarters, and broccoli was spooned onto plates.

According to guidance, when using family style meal service, a sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the food components for all children at the table, and to accommodate supervising adults if they eat with the children. Family

style meal service also allows children to make choices in selecting foods and the size of initial servings. Children should initially be offered the full required portion of each meal component.

A choice of milk is required when using family style meal service. Small, child-size pitchers are recommended for children to serve milk to themselves. Teachers can serve the milk when using family style meal service, and the children must be served the full serving of milk (1 cup).

During onsite observation, food was not on the tables, and children did not serve themselves. Children, based on their abilities, should be given the option to serve themselves. A teacher may help, but the child should lead. If instead children are served pre-plated meals, children must be provided with the minimum serving of each component (e.g. 1 ounce equivalent grain, 1 ounce equivalent meat/meat alternate, 3/4 cup vegetable, 1/2 cup fruit, 1 cup milk). As students ate, teachers offered them more depending on how well they were eating; some students also asked for and received additional food.

Training resources on family style meals may be found on SNT's Infant and Preschool in NSLP webpage: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool>. Additional resources are available from the Community Nutrition Team: <https://dpi.wi.gov/community-nutrition/cacfp/training/nutrition-wellness-training#mealservice>.

Smart Snacks

Currently, there are no food and beverage sales at Holy Rosary Catholic School. The Business Administrative Assistant expressed interest on behalf of the principal in food and beverage sales as a fundraising opportunity for upperclassmen. The Wisconsin Department of Public Instruction allows two fundraiser exemptions per student organization per school per school year, not to exceed two consecutive weeks each. An exempt fundraiser may sell foods and beverages that are not allowable under the Smart Snacks rule but this may not occur in the meal service area during meal service times. More information about Smart Snacks, including "Smart Snacks in a Nutshell," may be found at <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

Signage

Adequate signage helps ensure students accurately select a reimbursable meal. Signage should be posted near the beginning of the serving line. Update signage daily to include all menu items. Indicate clearly to students how many components at lunch must be taken to constitute a reimbursable meal. Include a statement indicating a student must take at least 1/2 cup fruit, vegetable, or fruit/vegetable combination as part of his or her reimbursable meal. If you are interested in ordering signage from the DPI School Nutrition Team, please visit <http://dpi.wi.gov/team-nutrition> and complete the Resource Order Form.

Offer versus Serve

Kitchen staff members were somewhat unclear about the Offer Versus Serve (OVS) requirements for lunch. We observed kitchen staff members placing foods on students' trays without allowing students to accept or decline them. Under Offer Versus Serve, students are permitted to decline some of the foods offered in a reimbursable meal. At lunch, students must select three of five components, including 1/2 cup fruit or vegetable. Although all students observed at lunch/breakfast took a reimbursable meal, it is important for staff to fully understand the OVS requirements. The current Offer Versus Serve Guidance manual is available on our website: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf>.

Findings and Corrective Action Needed

Meal Pattern Finding #1: Minimum daily requirements for vegetables were not met on Friday during the week of review. Additionally, vegetable subgroup minimum weekly requirements were not met, with a 1/2 cup shortage in the beans and peas (legumes) vegetable subgroup.

Required Corrective Action: Please submit a statement describing how you will meet the minimum daily requirements and vegetable subgroup requirements going forward.

Meal Pattern Finding #2: The required 1/2 cup fruit, vegetable, or fruit vegetable combination statement is missing from posted signage.

Required Corrective Action: Add a statement to your current signage that states the student must take at least ½ cup fruit, vegetable, or fruit/vegetable combination. Submit a photo of updated signage.

Meal Pattern Finding #3: Insufficient crediting documentation for baked chicken (Tyson Fully Cooked, Coated 8 Piece Cut Chicken, 18146-820).

Required Corrective Action: Please contact Tyson to obtain a product formulation statement (PFS) or a child nutrition (CN) label for this item, then submit. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool was completed on-site.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required. The school only sells adult meals and milk.
2. USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. You will need to create a policy by July 1, 2017.

For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>.

For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The first Food Safety Inspection was completed in November and the next inspections will be this spring.
2. The food service staff hand out plastic cups to students who would like water with their lunch. Great job enabling students to have water with their meal.

Comments/Technical Assistance/Compliance Reminders

1. Each SFA must designate at least one staff member as a program “director”. A program “director” is the person designated to perform or oversee the majority of the program duties such as sanitation, food safety, nutrition and menu planning, food production, procurement, financial management, record keeping, customer service, nutrition education, and general day-to-day program management. The director is required to have 12 hours of continuing education training hours each year. Part time staff must have 4 hours of training each year.
2. Consider using the [DPI tracking tool](#) to track Professional Standards training hours for staff.
 - SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff) name of training, and where the training was taken from (i.e. USDA webinar, DPI SNSDC course, etc.). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.
 - Check out our online webinars for additional training hours: <https://dpi.wi.gov/school-nutrition/training/webcasts>

Findings and Corrective Action Needed

❑ **Finding #1:** The Food Safety Plan is missing a list of the Process 1, 2, and 3 foods. It is also missing an SOP for TCS Foods.

Corrective Action Needed: Acquire these missing items from the Food Service Director at Kewaunee and add them to the Food Safety Plan. Forward copies of these to the Nutrition Program Consultant.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. Even though a summer feeding program is not operated at Holy Rosary, USDA would like all SFAs to inform families of where their students can receive a

free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the summer meals locator on the **DPI Summer Meals website**
 - Promotion of calling 211 to locate meals in the area
 - Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
 - Promotion of the USDA Summer Food website
<http://www.fns.usda.gov/summerfoodrocks>
3. The school is interested in participating in the Afterschool Snack Program. To participate in the program, the SFA must provide children with regularly scheduled activities in an organized, structured and supervised environment; and include educational or enrichment activities. You must follow the meal pattern: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-meal-pattern.pdf> Each student must take two components in order to be claimed. You will have to use a roster check off sheet and claim each snack by eligibility category (Free, Reduced or Paid). Here is the In a Nutshell: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/afterschool-snacks-in-a-nutshell.pdf>
4. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf. USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

